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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff.

v.

NEGASI ZUBERI, aka JUSTIN JOSHUA
HYCHE, aka SAKIMA ZUBERI,

Defendant.

Case No. 1:23-cr-00254-MC

**DEFENDANT'S PROPOSED VOIR
DIRE**

The defendant, Sakima Zuberi, through his attorneys, Michael Bertholf and Amy E. Potter, respectfully requests, pursuant to Fed. Rule of Crim. Proc. 24(a)(2)(A) and (B), that undersigned counsel be able to ask questions related to the following subject areas including

appropriate follow-up questions from the topics below and follow-up questions from the jury questionnaire:

I. PRESUMPTION OF INNOCENCE/BURDEN OF PROOF

1. The legal standard of proof in a criminal case compared to other types of cases.
2. The burden of proof for the government compared to the burden on the defendant.
3. How the jurors view defendant's decision to testify or not testify.
4. What does it mean that someone is a defendant in a criminal case.

II. MEDIA EXPOSURE

1. Whether juror has read or heard any account of this case involving Negasi or Sakima Zuberi.
2. The government is alleging that Mr. Zuberi held a person in a structure in his garage. Did you recall reading or hearing about any aspect of this allegation or any others?

III. EXPERIENCE AND ATTITUDE ABOUT FIREARMS

1. Follow up questions regarding experience and attitudes about firearms, explosives, and munitions.
2. Knowledge about different types of firearms and types of caliber.
3. Opinions about people who have criminal convictions having firearms.

IV. ATTITUDES ABOUT SEXUAL ACTIVITIES

1. General questions about jurors' opinions about persons who are commercial sex workers or those who engage in sex with them.
2. Questions about whether jurors have concerns experience with BDSM or other types of sex.

V. EVALUATION OF WITNESSES

1. What the role of jurors is in evaluating witness credibility, how comfortable the specific juror is in engaging in evaluating witness credibility and what factors the jurors should consider.
2. Questions about whether jurors could apply the same standard to all witnesses.

VI. FINAL QUESTIONS

1. Is there any reason why any of you do not believe that you could fairly judge this case?
2. Is there any reason why any of you believe that it would be better if you did not sit as a juror in this case?

DATED: August 7, 2024.

Respectfully submitted,

ANGELI LAW GROUP LLC

s/ Amy E. Potter

Amy E. Potter

Attorney for Defendant